

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Jamiel Lamont CAROTHERS

Case: 2:22-mj-30449
Case No. Assigned To : Unassigned
Assign. Date : 10/17/2022
Description: CMP USA v. CAROTHERS
(SO)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 9, 11, 2022 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2119	Carjacking
18 U.S.C. § 924(c)(1)(a)	Discharge firearm in relation to crime of violence
18 U.S.C. § 922(g)	Felon in Possession of Firearm

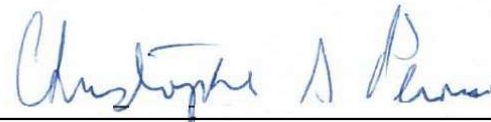
This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: October 17, 2022

City and state: Detroit, Michigan



Complainant's signature

Special Agent Christopher Pennisi - FBI

Printed name and title



Judge's signature

Hon. David R. Grand, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT

I, Christopher S. Pennisi, being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Special Agent of the Federal Bureau of Investigation (FBI) for seventeen years, and am currently assigned to the Violent Crime Squad in the Detroit Division of the FBI.

2. I am an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2501(7), that is, an officer of the United States who is empowered by the law to conduct investigations of and to make arrests for the offenses enumerated in 18 U.S.C. § 2516.

3. I have investigated federal violations concerning crimes of violence and firearms. I have gained experience through training and everyday work related to these types of investigations.

4. The statements contained in this affidavit are based on my experience and background as a special agent and on information provided by police officers, other agents of the FBI, and other law enforcement personnel. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all of facts known to law enforcement related to this investigation.

5. This affidavit is made in support of a criminal complaint charging JAMIEL CAROTHERS with taking a motor vehicle transported, shipped, or received in interstate commerce from the person or presence of another by force and violence or by intimidation and with intent to cause death or serious bodily harm in violation of 18 U.S.C. § 2119.

6. This affidavit is also made in support of a criminal complaint charging CAROTHERS with discharge of a firearm in relation to a crime of violence (carjacking) in violation of 18 U.S.C. § 924(c)(1)(A).

7. Finally, this affidavit is made in support of a criminal complaint charging CAROTHERS with possession of a firearm after being convicted of a crime for which punishment exceeds one year in violation of 18 U.S.C. § 922(g).

PROBABLE CAUSE

A. Background of the Investigation

8. On October 9, 2022 at approximately 8:38 pm, victim TS was at Detroit Wine and liquor, located at 10848 West 7 Mile Road in Detroit. As he left the store and approached his Chrysler 300, TS was confronted by a black male wearing a black jacket and a black baseball cap who was pointing a semi-automatic pistol at TS.

9. While pointing the pistol at TS, the male, later identified as JAMIEL CAROTHERS demanded TS' keys, and TS surrendered them. CAROTHERS then

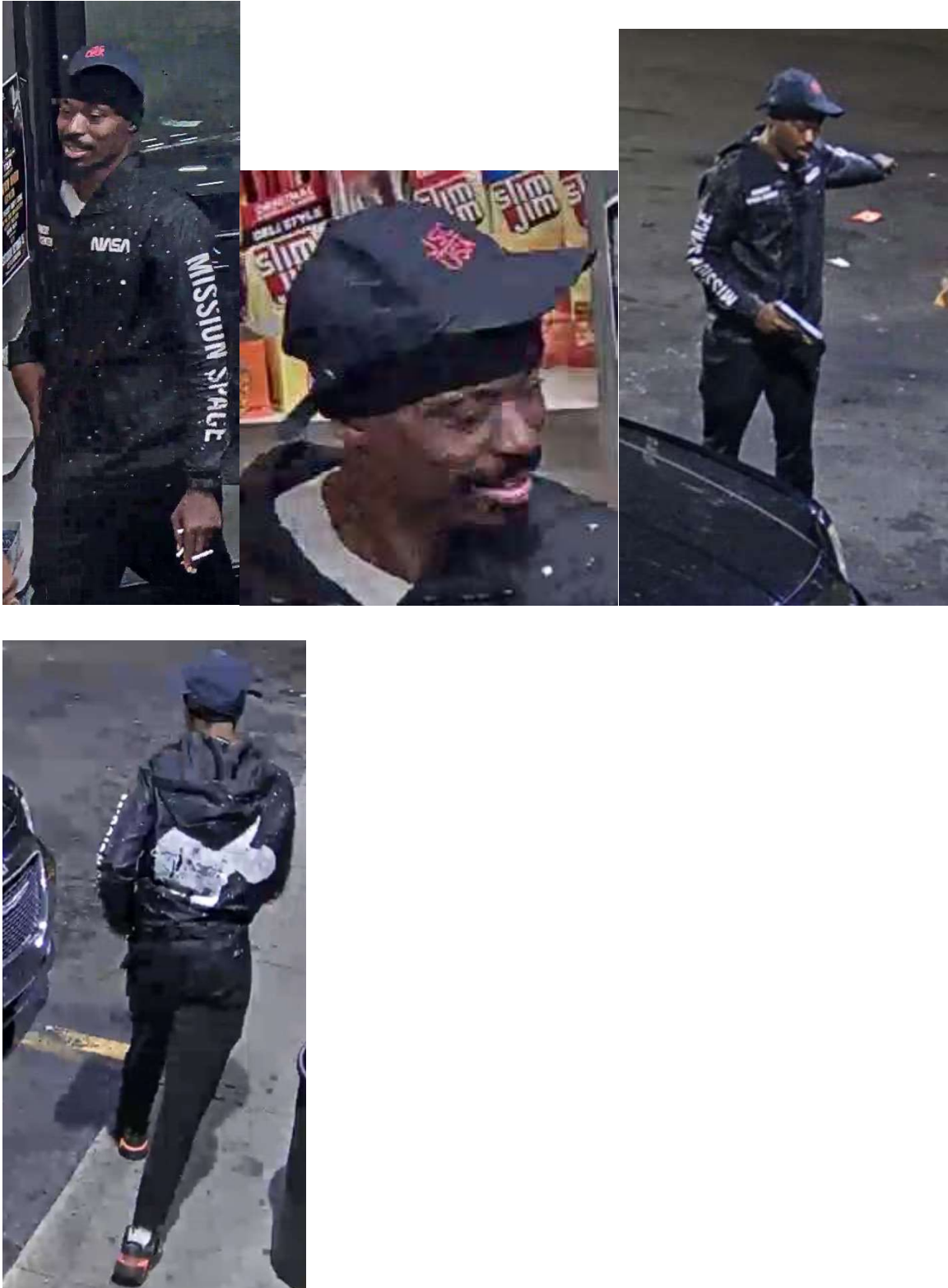
got into TS' car and began to drive away. However, he stopped, again pointed his gun at TS and demanded that TS reenter the car.

10. TS got into his car and CAROTHERS demanded that TS give him everything in his pockets then drove off. As he drove, CAROTHERS threatened to kill TS several times. TS gave CAROTHERS his wallet containing credit cards.

11. TS escaped the car as CAROTHERS stopped at a stop sign. CAROTHERS then fired one shot from the pistol at TS but missed.

12. Detroit Wine and Liquor has surveillance cameras that record video. Review of the video from the night of October 9, 2022 confirmed TS' complaint and revealed that CAROTHERS was inside the liquor store prior to robbing TS.

13. While in the store and during the carjacking, he was wearing a dark colored baseball hat with "JSC USA" on the front, black shoes with orange or red stripe on the heel and a black jacket with white writing "NASA" on the front, "MISSION SPACE" on the left sleeve and a large picture of a spacecraft on the back, as follows:



14. On October 11, 2022 victim AC was pumping gas into a Jeep Compass at 17949 West 7 Mile Road when an unknown black male approached and offered to pump the gas for her.

15. AC declined and then the male became angry, stated “give me this fucking car bitch or I’ll shoot you,” drew a handgun and pointed at her. The two struggled for a few seconds until AC ran off. In response, the male fired between two and four shots from the handgun at AC.

16. AC described the male that confronted her as wearing a black and orange hat, a black hoodie, and black and orange shoes.

17. Review of surveillance video of the incident revealed that the gunman was wearing a black jacket that appeared to be the same one that Carothers wore during the October 9 carjacking of TS with white writing on the front and down the left sleeve and a dark colored hat with writing on the left side. In particular, the picture on the rear of the jacket is the same as the picture on the rear of the jacket during the October 9 incident.

18. Depicted below, the rear of the jacket worn by the suspect in the October 10 attempted carjacking:



Depicted below is the Rear of jacket worn by Carothers during the October 9



Incident:

19. Photo stills from the surveillance video of the October 9 incident were sent to the Detroit Police Department Real Time Crime Center and subjected to

facial recognition analysis. That analysis identified JAMIEL CAROTHERS as a possible suspect.

20. On Thursday October 13, 2022 a photographic array was shown to victim TS. The array contained a total of six pictures of persons of similar build, hair style, skin complexion, and overall appearance to CAROTHERS. TS identified the picture of CAROTHERS as the persons that held him at gunpoint, took his car and then kidnapped him.

21. CAROTHERS' registered address with the Michigan Secretary of State is 19153 Washburn Street. The house was placed under surveillance on October 12, 2022 and October 14, 2022 and a black male strongly resembling CAROTHERS was seen entering and exiting the location on both days.

22. On October 14, 2022, CAROTHERS was observed leaving 19153 Washburn Street and travelling to a gas station located at 10833 W. 7 Mile Road in Detroit. The gas station had surveillance cameras, and review of the video showed CAROTHERS wearing a dark colored hat with "JSC USA" written on it:



23. Detroit Police officers took CAROTHERS into custody at the gas station, and he was still wearing the hat:



24. The hat was seized and photographed and appeared as follows:



25. Later on October 14, 2022, a search warrant was executed at 19153 Washburn Street. During the execution, a relative informed a member of the search team that CAROTHERS lived in the basement. A pair of sneakers was found in the basement with orange stripes on their heels. The sneakers appeared to be the same ones depicted in the surveillance video of the October 9, 2022 carjacking:



26. The booking photograph of CAROTHERS depicts the facial hair he had at the time of arrest to be identical to that of the perpetrator of the October 9 carjacking incident:



27. Review of the vehicle identification numbers for TS' car and the car AC was pumping gas into revealed that they were made in Canada and Mexico, respectively. Therefore, both vehicles were "transported in interstate commerce" as recited in 18 U.S.C. § 2119.

28. On August 1, 2012, CAROTHERS was convicted of Felony Firearm in violation of Michigan Compiled Law 750.227B-A and sentenced to two years in prison.

CONCLUSION

29. On October 9, 2022, CAROTHERS successfully took TS' Chrysler 300 at gunpoint, forced him back into the car and eventually fired at least one gunshot at him.

30. Based on the above information, probable cause exists that JAMIEL CAROTHERS took a motor vehicle transported, shipped, or received in interstate commerce from the person or presence of another by force and violence or by intimidation and with intent to cause death or serious bodily harm in violation of 18 U.S.C. § 2119, discharged a firearm in relation to a crime of violence (carjacking) in violation of 18 U.S.C. § 924(c) and possessed a firearm after having been convicted of a crime for which punishment exceeds one year in violation of 18 U.S.C. § 922(g).

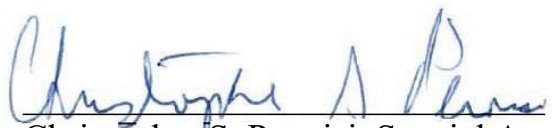
31. On October 10, 2022, JAMIEL CAROTHERS unsuccessfully attempted to take TS' Jeep Compass at gunpoint, and eventually fired at several gunshots at her after she ran off.

32. Therefore, probable cause exists that JAMIEL CAROTHERS attempted to take a motor vehicle transported, shipped, or received in interstate commerce from the person or presence of another by force and violence or by intimidation and with intent to cause death or serious bodily harm in violation of 18 U.S.C. § 2119 and possessed a firearm after having been convicted of a crime for which the punishment exceeds on year in violation of 18 U.S.C. § 922(g) with respect to victim AC.

33. In consideration of the foregoing, I respectfully request that this Court issue a complaint against CAROTHERS for violation of 18 U.S.C. §§ 2119, 924(c)(1)(A) and 922(g).

34. Further in consideration of the foregoing, I respectfully request that this Court issue arrest warrants for CAROTHERS for violation of 18 U.S.C. §§ 2119, 924(c)(1)(A), and 922(g).

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Christopher S. Pennisi", is written over a horizontal line.

Christopher S. Pennisi, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my
presence and/or by reliable electronic means.

A handwritten signature in blue ink, appearing to read "David R. Grand", is written over a horizontal line.
HON. DAVID R. GRAND
UNITED STATES MAGISTRATE JUDGE

Date: October 17, 2022